

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

Erik A. Ahlgren, in his capacity as assignee
in the assignment for the benefit of
creditors of Ashby Farmers Co-Operative
Elevator Company,

v.

Jay Link and Link's Wild Safaris,

Defendants.

Civil No. 19-00305 (JRT/LIB)

**DEFENDANTS' MOTION TO
DISMISS**

Defendants hereby move to dismiss all claims asserted by Plaintiffs. This motion is made pursuant to Fed. R. Civ. P. 12(b)(2) and 12(b)(6) on the grounds that this Court lacks personal jurisdiction over Defendants and the complaint fails to state a claim upon which relief can be granted. This motion is supported by all files, records, and proceedings herein, including Defendants' supporting memorandum of law, declaration of Jay Link, and proposed order.

Dated: February 28, 2019

Respectfully submitted,

BRIGGS AND MORGAN, P.A.

By: s/ Adam G. Chandler

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